

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

MELODY JOY CANTU and	§	
DR. RODRIGO CANTU,	§	
<i>Plaintiffs,</i>	§	
	§	
V.	§	CASE NO.: 5:20-CV-00746-JKP (HJB)
	§	
DR. SANDRA GUERRA and	§	
DIGITAL FORENSICS	§	
CORPORATION, LLC	§	
<i>Defendants.</i>	§	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE SUPPLEMENTAL MOTION FOR  
SUMMARY JUDGMENT**

Plaintiffs, Melody Joy Cantu and Dr. Rodrigo Cantu, under Local Rule CV-7(b) and Federal Rule of Civil Procedure 56(c), move the Court for leave to file a Supplemental Motion for Summary Judgment.

1. On August 29, 2022, Plaintiffs filed a Motion to Compel Defendant Digital Forensics Corporation (“DFC”) to produce withheld discovery.<sup>1</sup>

2. On November 3, 2022, to resolve the disputes regarding the withheld discovery, Plaintiffs and Defendants entered into a Joint Advisory Agreement agreeing that Defendants would produce withheld discovery.<sup>2</sup>

3. On November 11, 2022, DFC submitted supplemental discovery to Plaintiffs (attached as Exhibit A). This production, although deficient, includes evidence of Defendants’ phishing links and computer scripts used to surveil Plaintiffs.

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<sup>1</sup> See Dkt. 102.

<sup>2</sup> See Dkt. 116.

4. On December 12, 2022, Plaintiffs sent a letter to Defendant DFC requesting production of the withheld discovery materials (attached hereto as Exhibit B).

5. As of the date of this motion's filing, Defendant DFC has not yet produced the withheld discovery.

6. Accordingly, Plaintiffs request leave to file a Supplemental Motion for Summary Judgment to incorporate Defendants' belatedly produced evidence into Plaintiffs' arguments.

7. In accordance with Local Rule CV-7(b), a copy of Plaintiffs' proposed Memorandum in Support of their Supplemental Motion for Summary Judgment is attached as Exhibit C.

Dated: July 17, 2023.  
Brooklyn, NY

Respectfully submitted,

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*Counsel for Plaintiffs Melody Joy Cantu  
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**CERTIFICATE OF SERVICE**

I certify that on this 17<sup>th</sup> day of July 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/Michael Hassard